

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

NIKKI BOLLINGER GRAE, Individually and	)	Civil Action No. 3:16-cv-02267
on Behalf of All Others Similarly Situated,	)	
	)	Honorable Aleta A. Trauger
Plaintiff,	)	
	)	LEAD PLAINTIFF'S MOTION TO
vs.	)	COMPEL PRODUCTION OF IMPROPERLY
	)	WITHHELD DOCUMENTS
CORRECTIONS CORPORATION OF	)	
AMERICA, et al.,	)	
	)	
Defendants.	)	
_____	)	

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiff Amalgamated Bank, as Trustee for the LongView Collective Investment Fund hereby moves this Court for an order compelling the production of improperly withheld documents by defendants pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and this Court's February 13, 2020 Order. This Motion is based on the concurrently filed Memorandum of Law in support thereof, the Declaration of Christopher M. Wood and exhibits thereto, and such other evidence and argument as the Court may consider.

DATED: February 27, 2020

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on February 27, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Christopher M. Wood

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